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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA  
*ex rel.* PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

v.

PORTOLA DEL SOL OPERATOR, LLC, a  
foreign limited-liability company; TMIF II  
PORTOLA, LLC, a foreign limited-liability  
company; APARTMENT MANAGEMENT  
CONSULTANTS, LLC, a foreign limited  
liability company, and RENE  
RICHARDSON, as AGENT of PORTOLA  
DEL SOL OPERATOR, LLC.

Defendants.

No.: 2:21-CV-01123-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
RESPONSIVE PLEADINGS TO  
MOTION TO DISMISS AMENDED  
COMPLAINT BY DEFENDANT TMIF II  
PORTOLA, LLC.**

**FIRST REQUEST**

Plaintiff Peggy Thornton (“Thornton”) (collectively “Plaintiff”), Defendant TMIF II Portola, LLC (“TMIF”), by and through their undersigned attorneys, and pursuant to LR IA 6-1, submit the following Stipulation and Order to Extend Deadline to File Responsive Pleadings to

1 Motion to Dismiss Amended Complaint by Defendant TMIF II Portola, LLC. up to and including  
2 February 16, 2024. In support of the Stipulation, the parties state the following:

3 1. Thornton's responsive pleading to TMIF's Motion to Dismiss is currently due February 2,  
4 2024.

5 2. Because counsel for Thornton has pre-existing scheduling conflicts and recent staffing  
6 changes, Plaintiff requested a two-week extension until February 16, 2024.

7 3. Counsel for TMIF II Portola, LLC. has agreed to the requested extension and the requested  
8 extension will not impact any other deadlines in this case.

9 4. This is the first request to extend the deadline for Thornton to file their responsive pleading  
10 to TMIF's Motion to Dismiss.

11 5. This request for an extension of time is not intended to cause any undue delay or prejudice  
12 to any party.

13 6. Therefore, the Parties hereby stipulate that the deadline for Thornton to file their responsive  
14 pleadings shall be extended through February 16, 2024.

15 Dated this 1st day of February, 2024.

16 NEVADA LEGAL SERVICES, INC.

McDONALD CARANO LLP

17 By: /s/ Kristopher S. Pre

By: /s/ John A. Fortin

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19 *Attorneys for Plaintiffs*

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20  
21 **IT IS SO ORDERED:**

22 

23 UNITED STATES DISTRICT JUDGE

24 DATED: February 2, 2024